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June 12, 2018

**VIA ECF & FEDEX**

The Honorable Martin Glenn  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, NY 10004

**Re: In re Motors Liquidation Company, et al., Case No. 09-50026 (MG)**

Dear Judge Glenn:

We write in response to the letter sent to Your Honor by Messrs. Steinberg and Basta on June 11, 2018, solely to register our umbrage at the clear impropriety of their letter.

Under the pretext of unilaterally advising the Court of “recent developments,” New GM’s counsel transmitted to the Court its settlement letter sent to the undersigned counsel on June 1, 2018. The June 1 letter undeniably states it is being sent to PIWD counsel and GUC Trust counsel to “facilitate mediation and potential settlement.” Nonetheless, while the settlement-based request contained in the June 1 letter was being considered, New GM precipitously communicated the contents of that letter to Your Honor in its June 11 letter.

Regardless of whether the request will be granted, the undersigned simply could not let this breach of settlement protocol pass without comment.

New GM’s letter also attaches Order Nos. 25 and 148 from the MDL proceedings along with more than 100 pages of material -- all relating to pre-trial discovery in the MDL. Apart from whether such discovery is required or advisable as a predicate to settlement discussions, there is no discernible or credible reason for New GM’s June 11 letter to Your Honor other than as a tactic to effect an ex parte communication with this Court about discovery under the questionable guise of seeking a gold star for indicating it might possibly engage in settlement discussions. Assuming an “update” was even warranted at this time, a one sentence letter would have sufficed.

We hope this gamesmanship will not continue.



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Respectfully Submitted,

/s/ William P. Weintraub

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